

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN,  
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,  
CHRISTOPHER HUGHES, FACEBOOK, INC.,

Defendants.

Civil Action No. 1:04-cv-11923 (DPW)

District Judge Douglas P. Woodlock

Magistrate Judge Robert B. Collings

MARK ZUCKERBERG and  
FACEBOOK, INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER  
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

**DECLARATION OF MEREDITH H. SCHOENFELD  
IN SUPPORT OF PLAINTIFF'S MOTION FOR CONTEMPT**

I, Meredith H. Schoenfeld, declare as follows:

1. I am an attorney with the law firm of Finnegan, Henderson, Farabow, Garrett & Dunner, LLP, counsel for Plaintiff ConnectU LLC and Counterdefendants Cameron Winklevoss, Tyler Winklevoss, and Divya Narendra ("collectively ConnectU"). I make this Declaration in support of Plaintiff's Memorandum in Support of Motion for Contempt. I am an active member in good standing of the Bars of the State of California and the District of Columbia.

I have personal knowledge of the facts stated therein and if called as a witness, could and would competently testify thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff's Requests for Production of Documents and Things 1-170 and 171-185.
3. Attached hereto as Exhibit 2 is a true and correct copy of Facebook Defendants' Responses to Plaintiff's Requests for Production of Documents and Things 1-170 and 171-185.
4. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiff's First Set of Interrogatories.
5. Attached hereto as Exhibit 4 is a true and correct copy of Facebook Defendants' Responses to Plaintiff's First Set of Interrogatories.
6. Attached hereto as Exhibit 5 is a true and correct copy of a letter from John Hornick to Monte Cooper and Robert Hawk, dated April 25, 2006.
7. Attached hereto as Exhibit 6 is a true and correct copy a printout from the Accel website, available at [http://www.accel.com/news/news\\_one\\_up.php?news\\_id=1](http://www.accel.com/news/news_one_up.php?news_id=1)
8. Attached hereto as Exhibit 7 is a true and correct copy of a printout from Business Week available at [http://www.businessweek.com/technology/content/mar2006/tc20060327\\_215976.htm](http://www.businessweek.com/technology/content/mar2006/tc20060327_215976.htm)
9. Attached hereto as Exhibit 8 is a true and correct copy of a printout from the Greylock Partners website, available at [http://www.greylock.com/news/newsPortfolio\\_release.cfm?Id=457](http://www.greylock.com/news/newsPortfolio_release.cfm?Id=457)
10. Attached hereto as Exhibit 9 is a true and correct copy of a letter from Monte Cooper to John Hornick, dated April 26, 2006.
11. Attached hereto as Exhibit 10 is a true and correct copy of a letter from Monte Cooper to John Hornick, dated May 5, 2006.

12. Attached hereto as Exhibit 11 is a true and correct copy of the Defendant and Counterclaimant Facebook, Inc.'s Second Request to Plaintiff and Counterdefendants for Production of Documents and Things (Nos. 29-152).
13. Attached hereto as Exhibit 12 is a true and correct copy of a letter from Monte Cooper to John Hornick, dated May 9, 2006.
14. Attached hereto as Exhibit 13 is a true and correct copy of a letter from John Hornick to Monte Cooper, dated May 12, 2006.
15. Attached hereto as Exhibit 14 are true and correct copies of letters from Bruce Gibney to Ken Curtis, dated February 15 and 24, 2006.
16. Attached hereto as Exhibit 15 is a true and correct copy of the stock purchase agreement for Accel Partner's April 29, 2005 \$12.9 Million purchase of stock in Facebook produced by Accel Partners to Plaintiff in this litigation as ACCEL000001-95.
17. Attached hereto as Exhibit 16 is a true and correct copy of a summary Profit & Loss statement produced by Facebook Defendants to Plaintiff in this litigation as TFB006969.
18. Attached hereto as Exhibit 17 is a true and correct copy of a term sheet for Greylock Partners' \$25 Million purchase of 4.55% ownership in Facebook produced by Facebook Defendants to Plaintiff in this litigation as TFB006961-6972. .

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This Declaration is executed on the 9th day of June 2006.

/s/ Meredith H. Schoenfeld  
Meredith H. Schoenfeld